

## **REMARKS/ARGUMENTS**

The claims have been amended as set forth above. Applicants believe that the claims are in condition for allowance. Reconsideration is respectfully requested.

### **I. Rejection under 35 U.S.C. § 112, First Paragraph**

The Office Action indicates that it cannot find support for “a plurality of user applications statuses from a plurality of user applications.” Applicants point Examiner Pesin to FIGURE 4 and the related text. FIGURE 4 and the related text describe several user applications (e.g., 410<sub>1</sub> and 410<sub>2</sub>). FIGURE 4 and the related text also describe the several user applications as having a plurality of states (e.g., 420<sub>1</sub>- 420<sub>x</sub>, 430<sub>1</sub>-430<sub>x</sub>, and 440<sub>1</sub> – 440<sub>x</sub>). Reconsideration is respectfully requested.

### **II. Rejections Under 35 U.S.C. § 103**

Claims 1, 2, 6, 7, 11, 12, 16 and 17 are rejected under 35 U.S.C. § 102(a) as being unpatentable over U.S. Patent No. 5,877,765 issued to Dickman et al. (hereinafter “Dickman”) in view of “Optimizing the Windows Registry” by Ivens Kathy (hereinafter “Ivens”) and further in view of U.S. Patent No. 5,721,850 issued to Farry et al. (hereinafter “Farry”). Claims 21, 22, 26, 27 and 31 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Dickman in view of Ivens in view of Farry and further in view of U.S. Patent No. 6,762,692 issued to Mingot et al. (hereinafter “Mingot”). In light of the above amendments, applicants respectfully disagree with the rejections. Independent claim 1 includes the following combination of features that is not taught or otherwise suggested by the cited references:

providing an **application neutral shortcut application, wherein the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone, wherein the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone,** wherein the user interface includes a list of editable shortcuts associated with the user applications of the mobile telephone, wherein the user interface includes a shortcut tag type indication associated with each of the editable shortcuts that

indicates the type of shortcut tag for accessing a target of one of the applications of the mobile telephone;

linking the application neutral shortcut application to a collective application neutral shortcut data store that maintains shortcut data for a plurality of application types, wherein the shortcut data store includes a lookup table that links a plurality of different shortcut tag types to different types of targets, wherein the targets comprise application targets and content targets, wherein the shortcut tag types *include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag*;

monitoring user inputs to the mobile telephone from the application neutral shortcut application, wherein monitoring user input *includes monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs*;

determining whether the user input is a shortcut input, wherein the shortcut input comprises a shortcut tag associated with a application neutral shortcut application, and further wherein the shortcut tag corresponds to a shortcut target in the lookup table of the collective application neutral shortcut data store;

locating the shortcut target in the lookup table based on the shortcut tag when the user input is a shortcut input;

executing the application of the mobile telephone associated with the target when the located shortcut target is an application; and

executing the application of the mobile telephone associated with the target and automatically opening the content data when the shortcut target is a content target.

As indicated above, independent claim 1 has been amended to clarify the above features in combination with a mobile telephone. Independent claim 1 has also been amended to clarify that the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone. Independent claim 1 has been further amended to clarify that the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone. Moreover, independent claim 1 has been amended to clarify that the shortcut tag types *include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag*, in

combination with monitoring **including monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.** In combination with the other features of the claims having each of the shortcut tag types and monitoring user inputs associated with each type is important in the mobile telephone art because they provide a user multiple ways of tagging a shortcut on a limited functionality device where the device can monitor each type of input. By providing each, the user is afforded greater usability and versatility associated with the device. Applicants assert that none of the references teach the above features in combination with the included shortcut tag types and the monitoring of each type of input.

Dickman teaches associating shortcuts with a desktop operating system. In Dickman, the user can associate links with the desktop operating system and then **click on the links** to access the data associated with the shortcut. In Dickman, the shortcuts are tied to the desktop. Dickman does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag,** and **monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.**

Ivens teaches optimizing a windows registry for an operating system of a desktop computer. The registry is in charge of keeping track of file extensions and file types of the operating system. The registry is also responsible for keeping track of OLE objects and documents. The registry is associated with a windows-based operating system of a desktop computer. Ivens does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag,** and **monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.**

Farry teaches an alternative to windows-based navigation on a desktop operating system. Farry teaches that the terminals are DOS-based personal computers. (Farry at Col. 3, lines 30-45). Farry provides a system for programming hotkeys on the operating system to switch between applications that are simultaneously running on the operating system. (Farry at Col. 1, lines 60-65). Farry does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon**

**shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.**

With regard to Mingot, Mingot pertains to programming a remote for a television with a voice tag. The voice tag allows a user to speak a channel's name without having to remember a number of the channel or a feature of the television. (Mingot at Col. 1, line 55 – Col. 2, line 4). Mingot does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

The references fail to teach or otherwise suggest the above combination of features. As such applicants believe that claim 1 is allowable and applicants respectfully request reconsideration.

Independent claim 11 includes the following combination of features that is not taught or otherwise suggested by the cited references:

providing an **application neutral shortcut application, wherein the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone, wherein the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone,** wherein the user interface includes a list of editable shortcuts associated with the user applications of the mobile telephone, wherein the user interface includes a shortcut tag type indication associated with each of the editable shortcuts that indicates the type of shortcut tag for accessing a target of one of the applications of the mobile telephone;

linking the application neutral shortcut application to a collective application neutral shortcut data store that maintains shortcut data for a plurality of application types, wherein the shortcut data store includes a lookup table that links a plurality of different shortcut tag types to different types of targets, wherein the targets comprise application targets and content targets, wherein the shortcut tag types **include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag;**

monitoring user inputs to the mobile telephone from the application neutral shortcut application, wherein monitoring user input **includes monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs;**

determining whether the user input is a shortcut input, wherein the shortcut input comprises a shortcut tag associated with a application neutral shortcut application, and further wherein the shortcut tag corresponds to a shortcut target in the lookup table of the collective application neutral shortcut data store;

locating the shortcut target in the lookup table based on the shortcut tag when the user input is a shortcut input;

executing the application of the mobile telephone associated with the target when the located shortcut target is an application; and

executing the application of the mobile telephone associated with the target and automatically opening the content data when the shortcut target is a content target.

As indicated above, independent claim 11 has been amended to clarify the above features in combination with a mobile telephone. Independent claim 11 has also been amended to clarify that the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone. Independent claim 11 has been further amended to clarify that the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone. Moreover, independent claim 11 has been amended to clarify that the shortcut tag types **include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag**, in combination with monitoring **including monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.** In combination with the other features of the claims having each of the shortcut tag types and monitoring user inputs associated with each type is important in the mobile telephone art because they provide a user multiple ways of tagging a shortcut on a limited functionality device where the device can monitor each type of input. By providing each, the user is afforded greater usability and versatility associated

with the device. Applicants assert that none of the references teach the above features in combination with the included shortcut tag types and the monitoring of each type of input.

Dickman teaches associating shortcuts with a desktop operating system. In Dickman, the user can associate links with the desktop operating system and then click on the links to access the data associated with the shortcut. In Dickman, the shortcuts are tied to the desktop. Dickman does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag**, and **monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs**.

Ivens teaches optimizing a windows registry for an operating system of a desktop computer. The registry is in charge of keeping track of file extensions and file types of the operating system. The registry is also responsible for keeping track of OLE objects and documents. The registry is associated with a windows-based operating system of a desktop computer. Ivens does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag**, and **monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs**.

Farry teaches an alternative to windows-based navigation on a desktop operating system. Farry teaches that the terminals are DOS-based personal computers. (Farry at Col. 3, lines 30-45). Farry provides a system for programming hotkeys on the operating system to switch between applications that are simultaneously running on the operating system. (Farry at Col. 1, lines 60-65). Farry does not teach the above features in combination with the shortcut tag types **including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag**, and **monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs**.

With regard to Mingot, Mingot pertains to programming a remote for a television with a voice tag. The voice tag allows a user to speak a channel's name without having to remember a number of the channel or a feature of the television. (Mingot at Col. 1, line 55 – Col. 2, line 4). Mingot does not teach the above features in combination with the shortcut tag types **including a**

***speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

The references fail to teach or otherwise suggest the above combination of features. As such applicants believe that claim 11 is allowable and applicants respectfully request reconsideration.

Independent claim 21 includes the following combination of features that is not taught or otherwise suggested by the cited references:

providing an **application neutral shortcut application, wherein the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone, wherein the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone**, wherein the user interface includes a list of editable shortcuts associated with the user applications of the mobile telephone, wherein the user interface includes a shortcut tag type indication associated with each of the editable shortcuts that indicates the type of shortcut tag for accessing a target of one of the applications of the mobile telephone;

linking the application neutral shortcut application to a collective application neutral shortcut data store that maintains shortcut data for a plurality of application types, wherein the shortcut data store includes a lookup table that links a plurality of different shortcut tag types to different types of targets, wherein the targets comprise application targets and content targets, wherein the content targets include a target to content data within an application that is navigatable to after the initial launch of the application, wherein the shortcut tag types **include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag**;

monitoring user inputs to the mobile telephone from the application neutral shortcut application, wherein monitoring user input **includes monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs**;

determining whether the user input is a shortcut input, wherein the shortcut input comprises a shortcut tag associated with a application neutral shortcut application,

and further wherein the shortcut tag corresponds to a shortcut target in the lookup table of the collective application neutral shortcut data store;

locating the shortcut target in the lookup table based on the shortcut tag when the user input is a shortcut input;

executing the application of the mobile telephone associated with the target when the located shortcut target is an application; and

executing the application of the mobile telephone associated with the target and automatically opening the content data when the shortcut target is a content target.

As indicated above, independent claim 21 has been amended to clarify the above features in combination with a mobile telephone. Independent claim 21 has also been amended to clarify that the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone. Independent claim 21 has been further amended to clarify that the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone. Moreover, independent claim 21 has been amended to clarify that the shortcut tag types ***include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag***, in combination with monitoring ***including monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs***. In combination with the other features of the claims having each of the shortcut tag types and monitoring user inputs associated with each type is important in the mobile telephone art because they provide a user multiple ways of tagging a shortcut on a limited functionality device where the device can monitor each type of input. By providing each, the user is afforded greater usability and versatility associated with the device. Applicants assert that none of the references teach the above features in combination with the included shortcut tag types and the monitoring of each type of input.

Dickman teaches associating shortcuts with a desktop operating system. In Dickman, the user can associate links with the desktop operating system and then ***click on the links*** to access the data associated with the shortcut. In Dickman, the shortcuts are tied to the desktop. Dickman does not teach the above features in combination with the shortcut tag types ***including***



***a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

Ivens teaches optimizing a windows registry for an operating system of a desktop computer. The registry is in charge of keeping track of file extensions and file types of the operating system. The registry is also responsible for keeping track of OLE objects and documents. The registry is associated with a windows-based operating system of a desktop computer. Ivens does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

Farry teaches an alternative to windows-based navigation on a desktop operating system. Farry teaches that the terminals are DOS-based personal computers. (Farry at Col. 3, lines 30-45). Farry provides a system for programming hotkeys on the operating system to switch between applications that are simultaneously running on the operating system. (Farry at Col. 1, lines 60-65). Farry does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

With regard to Mingot, Mingot pertains to programming a remote for a television with a voice tag. The voice tag allows a user to speak a channel's name without having to remember a number of the channel or a feature of the television. (Mingot at Col. 1, line 55 – Col. 2, line 4). Mingot does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

The references fail to teach or otherwise suggest the above combination of features. As such applicants believe that claim 21 is allowable and applicants respectfully request reconsideration.

Independent claim 31 includes the following combination of features that is not taught or otherwise suggested by the cited references:

a processor; and

a memory having computer-executable instructions stored thereon, wherein the computer executable instructions are configured for:

providing an application neutral shortcut application, wherein the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of a mobile device, wherein the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile device, wherein the user interface includes a list of editable shortcuts associated with the user applications of the mobile device, wherein the user interface includes a shortcut tag type indication associated with each of the editable shortcuts that indicates the type of shortcut tag for accessing a target of one of the applications of the mobile device;

providing shortcuts to a plurality of targets in a lookup table of the application neutral shortcut data store that maintains shortcut data for a plurality of application types, wherein the lookup table includes a plurality of shortcut tag types associated with different types of targets, and further wherein the targets comprise application targets and content targets, wherein the shortcut tag types include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag;

monitoring user input to the mobile electronic device from the application neutral shortcut application, wherein monitoring user input includes monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs;

determining whether the user input is a shortcut input, wherein the shortcut input comprises a shortcut tag, and further wherein the shortcut tag corresponds to a shortcut target in the lookup table;

locating the shortcut target in the lookup table based on the shortcut tag; and  
executing the application of the mobile device associated with the target, wherein the content is accessed when the located shortcut target is a content target.

As indicated above, independent claim 31 has been amended to clarify the above features in combination with a mobile telephone. Independent claim 31 has also been amended to clarify that the application neutral shortcut application is independently accessible from a plurality of user application statuses from a plurality of user applications of the mobile telephone. Independent claim 31 has been further amended to clarify that the application neutral shortcut application includes a user interface that is independently accessible from the plurality of user application statuses from a plurality of user applications of the mobile telephone. Moreover, independent claim 31 has been amended to clarify that the shortcut tag types ***include a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag***, in combination with monitoring ***including monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs***. In combination with the other features of the claims having each of the shortcut tag types and monitoring user inputs associated with each type is important in the mobile telephone art because they provide a user multiple ways of tagging a shortcut on a limited functionality device where the device can monitor each type of input. By providing each, the user is afforded greater usability and versatility associated with the device. Applicants assert that none of the references teach the above features in combination with the included shortcut tag types and the monitoring of each type of input.

Dickman teaches associating shortcuts with a desktop operating system. In Dickman, the user can associate links with the desktop operating system and then ***click on the links*** to access the data associated with the shortcut. In Dickman, the shortcuts are tied to the desktop. Dickman does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag***, and ***monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs***.

Ivens teaches optimizing a windows registry for an operating system of a desktop computer. The registry is in charge of keeping track of file extensions and file types of the operating system. The registry is also responsible for keeping track of OLE objects and documents. The registry is associated with a windows-based operating system of a desktop computer. Ivens does not teach the above features in combination with the shortcut tag types

***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

Farry teaches an alternative to windows-based navigation on a desktop operating system. Farry teaches that the terminals are DOS-based personal computers. (Farry at Col. 3, lines 30-45). Farry provides a system for programming hotkeys on the operating system to switch between applications that are simultaneously running on the operating system. (Farry at Col. 1, lines 60-65). Farry does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

With regard to Mingot, Mingot pertains to programming a remote for a television with a voice tag. The voice tag allows a user to speak a channel's name without having to remember a number of the channel or a feature of the television. (Mingot at Col. 1, line 55 – Col. 2, line 4). Mingot does not teach the above features in combination with the shortcut tag types ***including a speed dial shortcut tag, a voice shortcut tag, a menu item shortcut tag and an icon shortcut tag, and monitoring speed dial selection inputs, voice tag inputs, menu item selection inputs and icon selection inputs.***

The references fail to teach or otherwise suggest the above combination of features. As such applicants believe that claim 31 is allowable and applicants respectfully request reconsideration.

With regard to the dependent claims, the dependent claims include features that are not taught or otherwise suggested by the cited references. Moreover, those claims ultimately depend from the independent claims set forth above. As such, they should be allowable for at least those same reasons.

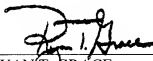
### **III. Request for Reconsideration**

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is

respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicants at the telephone number provided below.

Respectfully submitted,

MERCHANT & GOULD P.C.



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